U S WEST, Inc.
1801 California Street, Suite 5100
Denver, Colorado 80202
303 672-2860
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James T. Hannon
Senior Attorney

EX PARTE OR LATE FILED

U S WEST

EX PARTE

January 8, 1999

RECEIVED
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

By Hand

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

RE: CC Docket No. 96-128, In the Matter of Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996

Dear Ms. Roman Salas:

Pursuant to Section 1.1206(b)(1) of the Rules of the Federal Communications Commission, 47 C.F.R. Section 1.1206(b)(1), enclosed for filing are two copies of an Ex Parte letter and attachment that are being transmitted today to Ms. Anna M. Gomez, Chief of the Network Services Division, Common Carrier Bureau.

Please see that these materials are associated with CC Docket No. 96-128 and become part of the record for this proceeding. Thank you in advance for your assistance with this matter.

Finally, please also note that a third copy of this correspondence has been included with this package so that it can be stamped as received and returned to the messenger who has been instructed to wait for it.

Respectfully,

James T. Hannon

James T. Hannon

Attachment

c: A. Gomez

No. of Copies rec'd 0 + 3
List A B C D E

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James T. Hannon
Senior Attorney

EX PARTE

January 8, 1999

Ms. Anna M. Gomez
Chief, Network Services Division
Common Carrier Bureau
Federal Communications Commission
Room 230
2000 M Street, N.W.
Washington, DC 20554

Dear Ms. Gomez:

I am writing to elaborate on my letter of December 11, 1998, to Lawrence E. Strickling, concerning U S WEST's progress in the implementation of FLEX ANI (letter attached as Exhibit A). In that letter, U S WEST stated that while it has made great progress in FLEX ANI implementation, certain minor technical obstacles to 100% implementation remain. Noting that SBC and SNET had sought waivers of the FLEX ANI requirement, U S WEST asked that, if the Bureau deemed such waivers necessary, U S WEST's letter be treated as a request for a limited extension of its existing waivers. On December 29, 1998, U S WEST filed comments in support of the limited extensions requested by SBC, SNET, and GTE, noting again that U S WEST's letter should, if necessary, be treated as a similar request.

In light of your letter to counsel for SBC, SNET and GTE, dated December 29, 1999, I have attempted herein to explain further the reasons for U S WEST's request for extension of its existing waiver, should the Bureau deem such a waiver necessary.

A brief review of the history of this issue may be helpful. When the Commission first announced the requirement that payphones transmit specific coding digits for per-call compensation purposes, U S WEST intended to satisfy this requirement through the use of OLNS/LIDB, a call screening technology that had been available for anti-fraud purposes. With the release of the Commission's October 7, 1997, Waiver Order -- which extended the time for implementation of the payphone specific coding digit requirement to March 9, 1998 -- U S WEST determined that the Commission would not find OLNS an acceptable means of complying with the payphone specific coding digit requirement. Shortly thereafter, U S WEST

undertook an internal study to determine what would be required to implement FLEX ANI for payphones throughout its 14-state service area.

In a January 16, 1998, letter to John Muleta requesting an extension of the then-existing payphone-specific coding digit waiver, U S WEST committed to installing and implementing FLEX ANI in those end offices serving 90 percent of independent PSP lines by June 30, 1998.[1] At the same time, U S WEST knew that because of the work needed to implement FLEX ANI, it would be impossible to install FLEX ANI in its switches and to perform the necessary translations and testing in all of its switches by June 30. U S WEST therefore committed to making 99 percent of its "dumb" payphone lines FLEX ANI capable by December 31, 1998, with the remainder FLEX ANI capable by March 30, 1999. U S WEST has more than lived up to that schedule. At this time, with the exception of 18 dumb payphone lines served by U S WEST's Mason City, Iowa, end office, every single payphone line served by U S WEST is capable of transmitting FLEX ANI digits.

In its March 9, 1998, Waiver Order, the Commission granted U S WEST until June 30, 1998, to provide FLEX ANI to 90 percent of the smart phones in its service area, and until December 31, 1998, to complete implementation of FLEX ANI.[2] Again, U S WEST has never sought any prior waiver extension and has, with the exception of Mason City noted above, complied with this schedule.[3]

Beyond the question of FLEX ANI implementation, however, is the question of the technical imperfections in FLEX ANI as it has been made available by U S WEST's vendors, Lucent and Nortel. U S WEST became aware in early 1998 that other large LECs -- who had begun implementing FLEX ANI ahead of U S WEST -- had discovered deficiencies in the use of FLEX ANI for per-call compensation purposes. U S WEST also knew that LECs and vendors had undertaken efforts to resolve these issues. U S WEST therefore understood that the schedule announced by Lucent and Nortel for making available features intended to resolve these

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[1]Implementation of FLEX ANI has less of an impact in the case of LEC payphones because a large number of those payphones are "dumb" payphones attached to "smart" payphone lines, which transmit payphone-specific digits even in the absence of FLEX ANI. While a majority of U S WEST payphones are "dumb," U S WEST has installed a higher percentage of "smart" payphones than many other LECs.

[2]See Memorandum Opinion and Order, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, 13 FCC Rcd. 4998, 5034, ¶ 71 (Com. Car. Bur. 1998).

[3]U S WEST has informed affected PSPs of the situation in the Mason City office and will attempt to resolve any complaints that PSPs or IXCs may have without further involving the Commission.

problems represented the most expeditious possible resolution. Both Lucent and Nortel have stated that they have made these features available as fast as practicable.[4]

As the Bureau is aware, two problems remain. It should be emphasized that both of these problems are minor. The first -- the tandem screening problem -- prevents the transmission of payphone specific FLEX ANI digits on subscriber 800 calls in those cases where some IXCs have declined to request FLEX ANI. While the number of subscriber 800 calls is large, the number of affected payphones in U S WEST's territory is very small. Only 184 payphones served by U S WEST are affected by this problem -- about one-tenth of one percent of the total.

U S WEST purchased the feature required for resolution of this problem in 1998 and anticipated that it would be available for all payphones in U S WEST territory, before the end of 1998. However, because the Nortel feature for Tandem Screening was not patched back to the NA004 generic, four Nortel tandem switches, serving eight end offices, are not currently able to screen FLEX ANI digits on subscriber 800 calls. U S WEST anticipates that the tandem screening problem will be resolved in two end offices serving 92 of these 184 payphones by February 5, 1999. The problems will be resolved in five end offices serving 73 of these payphones before March 31, 1999, and in the remaining two end offices, serving 19 payphones, by May 10, 1999. An implementation schedule, identifying the end offices in question, is attached hereto as Exhibit B.

The second problem affects only those 800 calls that are converted to POTS numbers. U S WEST believes that less than one percent of 800 calls -- well less than one percent of compensable calls -- are 800-to-POTS calls. U S WEST has nonetheless committed to purchasing the feature required to resolve this problem as the feature becomes available. In the case of Lucent 5ESS switches, this feature will be available in April of 1999. U S WEST therefore cannot commit to installation and testing of this feature before June 30, 1999. In the case of Nortel, the feature was made available to U S WEST on December 23, 1998, too late in the year for U S WEST to complete installation before December 31, 1998. U S WEST anticipates that installation of the feature will be complete by March 31, 1999. Only in the case of the Lucent 1AESS is the feature required for resolution of the 800-to-POTS problem unavailable. Therefore, the 800-to-POTS problem will be resolved in 1AESS offices only as those switches are replaced, which will occur on a rolling basis beginning this year and to be completed by 2002.[5]

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[4]U S WEST is obtaining documentation from Lucent and Nortel, as called for in the December 29, 1998, letter and will provide this documentation as soon as it is available.

[5]There are 98 1AESS end offices in U S WEST territory serving approximately 15,000 payphones -- less than 10 percent of the total payphone lines served by U S WEST.

The foregoing numbers make clear that the number of payphones and compensable calls that are affected by the remaining technical problems is quite small. However, these numbers actually overstate the impact. This is because relatively few carriers have relied on FLEX ANI for payment of per-call compensation. Prior to September 15, 1998, only WorldCom, among the major IXCs, had ordered FLEX ANI from U S WEST. On September 15, 1998, Sprint requested FLEX ANI; on December 10, 1998, MCI added its request. However, all carriers have been required to pay per-call compensation on the calls from over 90 percent of the pay telephones in U S WEST territory since June 30, 1998. Thus, with the exception of Sprint and WorldCom -- which carry less than 23% of such traffic[6] -- all major IXCs, as well as the vast majority of smaller carriers, have known that they would be required to pay per-call compensation without benefit of FLEX ANI into the first quarter of 1999.[7]

This fact is significant because it suggests that the Commission should require IXCs to pay per-call compensation on all payphones where the only remaining FLEX ANI problem is the 800-to-POTS problem. As the foregoing numbers indicate, because most carriers have not requested FLEX ANI and are tracking calls in some other way, at most only a fraction of the less than one percent of calls that are 800-to-POTS calls will be missed as a result of this glitch.[8] This is truly a de minimis amount -- at most a few pennies per payphone per month. To be sure, U S WEST will eliminate this problem as quickly as possible. But, in the meantime, such inevitable imperfections have no significant impact on the obligations of IXCs or the revenues to be earned by PSPs.

In the case of the tandem screening problem, on the other hand, it would be inappropriate to require PSPs to accept per-call compensation if a significant number of calls are going to be missed by those carriers receiving FLEX ANI. Thus U S WEST believes that the Commission should continue to waive the FLEX ANI transmission requirement and authorize payment of per-payphone compensation through the first quarter of 1999 for the 92 payphones served by the Grand Marais and Gillette end offices; similarly, the Commission should extend its waiver for

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[6]See Order, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, 13 FCC Rcd. 7303, 7306 n. 18 (Com. Car. Bur. 1998).

[7]MCI is included in this list because FLEX ANI digits are actually transmitted with payphone calls 45 days after a request is received, to permit testing and implementation by U S WEST and the requesting IXC.

[8]For carriers that have not requested FLEX ANI, the 800-to-POTS conversion problem is simply irrelevant. Even for those carriers that have requested FLEX ANI, because such calls carry the "24" ANI digits -- identifying the call as an 800-to-POTS call -- rather than the "07" digits -- which identify all calls from restricted lines -- and because the number of such calls is small, it may be a relatively simple matter for the carriers to track and pay compensation on these calls.

the remaining 92 payphones served by the remaining end offices listed in Attachment B through the second quarter of 1999.[9]

U S WEST submits that the foregoing waiver extensions are clearly in the public interest. By granting the waivers, the Commission can reassure the industry -- LECs, PSPs, and IXCs alike -- that the per-call compensation system will function smoothly.

Please call me at (303) 672-2860 if I can provide further information or clarification.

Sincerely,

James T. Hannon

James T. Hannon

[9]Although FLEX ANI will be implemented in the Ocean Shores, Lapine, Black Butte, and Warm Springs end offices prior to the end of the first quarter of 1999, the Commission has required IXCs to pay compensation on a per-call, rather than per-phone, basis only for those payphones that are FLEX ANI capable 30 days prior to the quarter for which compensation is to be paid. See Memorandum Opinion and Order, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, 13 FCC Rcd 10893, 10904 n.57 (Com. Car. Bur. 1998).

Exhibit B

State	Switch Name	Switch Type	Payphone Lines	Date Ready
Minnesota	Grand Marais	5ESS	1	2/5/99
Wyoming	Gillette	DMS100	91	2/5/99
Washington	Ocean Shores	DMS10	21	3/16/99
Oregon	Lapine	DMS10	38	3/29/99
Oregon	Black Butte	DMS10	1	3/29/99
Oregon	Warm Springs	DMS10	13	3/29/99
North Dakota	Dickinson	1AESS	12	5/10/99
North Dakota	Williston	1AESS	7	5/10/99

EXHIBIT A

Stamp + Return

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James T. Hannon
Senior Attorney

U S WEST

EX PARTE

December 11, 1998

Lawrence E. Strickling, Esquire
Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Mr. Strickling:

I am writing to inform you of the progress that U S WEST has made in implementing FLEX ANI. In January, I sent the attached letter to John Muleta to explain the obstacles that U S WEST faced in the implementation of FLEX ANI and to ask that U S WEST be granted a waiver until March 30, 1999, to implement FLEX ANI in all of its switches. In its March 9 Waiver Order,[1] the Bureau gave U S WEST until December 31, 1998 to implement FLEX ANI.

I am pleased to report that U S WEST is on target to install FLEX ANI in all but one of its switches by December 31. The sole exception is the U S WEST end office in Mason City, Iowa. The switch in that end office, a Nortel DMS 100/200, has insufficient memory at its current generic to implement FLEX ANI. Only 18 payphones, of over 170,000 in U S WEST's territory, are affected by this situation. (The remaining 143 payphone lines served by this end office are "smart" lines that transmit payphone specific digits.) U S WEST has already contracted with Nortel to upgrade this switch generic and to implement FLEX ANI; this work should be completed by the end of February, 1999. U S WEST will inform PSPs affected by this problem of the expected delay, and will attempt to resolve any complaints they, or affected IXCs, may have without further involving the Commission.

In the March 9 Waiver Order, the Bureau noted that several LECs had reported additional technical difficulties affecting FLEX ANI transmission with certain switches and call types. The Bureau gave the BOCs 90 days to resolve these technical problems. U S WEST accordingly

[1] In the Matter of Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, Memorandum Opinion and Order, 13 FCC Rcd. 4998, 5034-35 ¶ 71 (1998).

expected that its vendors would be in a position to implement FLEX ANI free of these technical problems. This has not proven to be the case. Two problems remain, as described below: 800/POTS conversion and Flex ANI screening at the access tandem.

U S WEST notes that SBC has sought an extension of its temporary waiver for implementation of Flex ANI,[2] as has SNET.[3] It appears that these companies face obstacles in their efforts to secure technical solutions to the remaining Flex ANI problems similar to those encountered by U S WEST. To the extent the Bureau deems necessary, U S WEST asks that the Bureau treat this informational letter as a request for a temporary waiver, similar to the one requested by SBC and SNET. U S WEST asks that such a waiver give U S WEST explicit permission to resolve the 800/POTS Conversion problems and Tandem Screening problems according to the schedule described herein.

1. 800/POTS Conversion

Neither the Nortel DMS 100 and DMS 100/200 switches, nor the Lucent 5ESS and 1AESS switches are able to retain the FLEX ANI digits on calls that are converted from 800 numbers to POTS numbers. This problem affects the passage of 27 digits on smart lines just as it does FLEX ANI codes on dumb lines. When the switch queries the 800 database, if the database has a POTS routing number rather than a carrier identification code, the telephone number is returned and the switch replaces the original FLEX ANI digits with 24, which identifies the call as an 800-type call.

This problem affects all U S WEST end office and tandem switches performing the Service Switching Point functionality. However, the number of calls affected by this problem is very small: less than one percent of the numbers in the database are 800-to-POTS numbers, and it is U S WEST's experience that these numbers tend to be among the least frequently called 800 numbers.[4] U S WEST will implement technical fixes for this problem as soon as vendors make them available. In the case of Nortel switches, a solution should be in place by March 31, 1999. In the case of the Lucent 5ESS, the vendor has informed U S WEST that no solution will even be available until March, 1999; U S WEST will accordingly implement this solution by June 30, 1999.

Finally, in the case of the Lucent 1AESS, the vendor has stated that it will not support the 1AESS for FLEX ANI problems. U S WEST accordingly will be unable to address this problem

[2] Petition for Expedited Temporary Extension of Limited Waiver to Implement Flex ANI by Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell, filed Dec. 9, 1998.

[3] Petition for Expedited Waiver of Southern New England Telephone Company, filed Dec. 9, 1998.

[4] Many of these numbers are "personal" 800 numbers; the POTS conversion permits routing to the subscriber's home telephone number.

until these switches are replaced. U S WEST has 98 end offices in which 1AESS switches are deployed; they will be replaced on a rolling basis beginning in 1999; all such switches will be replaced by 2002.

2. Tandem Screening

Access tandem switches do not have the ability to determine whether or not IXCs are able to receive FLEX ANI digits. In the case of calls where the 800 database look-up is performed at the access tandem rather than at the end office, the switch is unable to send FLEX ANI digits selectively; the digits are sent to all IXCs or to none.[5] If FLEX ANI is sent to an IXC that is unprepared to receive it, the call may be dropped. This problem affects calls from smart and dumb payphones in the same way.

This problem affects very few payphones served by U S WEST. Only 14 U S WEST end offices lack SS7 signaling and therefore rely on the access tandem to perform the 800 database look-up; only 219 payphone lines (less than two-tenths of one percent of the payphones in U S WEST territory) are affected. All of these payphones are served by Nortel tandems. U S WEST has already purchased the required technical upgrades from the vendor to resolve this problem and will implement this solution by March 31, 1999. In addition, U S WEST has purchased the feature required to resolve this problem for approximately 20 additional Nortel access tandems; all such tandems should be capable of screening for FLEX ANI by March 31, 1999.

U S WEST stands ready to work with PSPs, IXCs, and other LECs to ensure that any remaining obstacles to efficient administration of per-call compensation are quickly resolved. I hope that this information is helpful.

Yours sincerely,

James T. Hannon

James T. Hannon

[5] Few IXCs have so far requested this service.

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James T. Hannon
Senior Attorney

U S WEST

EX PARTE

January 16, 1998

John Muleta, Esquire
Deputy Chief
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: CC Docket No. 96-128, In the Matter of Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996

Dear Mr. Muleta,

On December 23, 1997, Michael Kellogg, Counsel for the RBOC Payphone Coalition, and Ms. BB Nugent of U S WEST's Washington D.C. office, met with you to discuss U S WEST's decision to convert to Flex ANI in order to satisfy the Commission's requirement that payphones transmit specific coding digits for per-call compensation purposes.

As you know, U S WEST had previously intended to satisfy this requirement through the use of OLNS which U S WEST implemented to comply with the fraud control requirements of CC Docket No. 91-35.[1] Until last fall, U S WEST was of the opinion the Commission would find OLNS to be an acceptable means of satisfying both the requirements of CC Docket Nos. 91-35 and 96-128. The language of the Commission's October 7, 1997 Waiver Order (which waived the payphone-specific digit requirement until March 9, 1998) convinced U S WEST that the Commission would not find OLNS to be a satisfactory means of complying with the payphone-specific digit requirement.

[1] OLNS has been available for anti-fraud purposes since September 15, 1997 when U S WEST Communications Transmittal No. 858 took effect. On September 30, 1997, U S WEST and certain other LECs (who elected to use OLNS to satisfy their obligations under CC Docket No. 91-35) offered to provide free access to OLNS to IXCs for per-call compensation purposes until the Commission had an opportunity to address the payphone-specific digit issue. See Letter of Michael Kellogg, counsel for the LEC ANI Coalition, to John Muleta, Acting Deputy Chief, Common Carrier Bureau, Federal Communications Commission, dated September 30, 1997.

Shortly after the issuance of the Waiver Order, U S WEST initiated an internal study to determine what was required to implement Flex ANI for payphones throughout its 14 state service area.[2] Unfortunately, U S WEST was still in the process of conducting its study on December 23, 1997, when Mr. Kellogg and Ms. Nugent met with you. As a result, Ms. Nugent was unable to provide you with any details on U S WEST's deployment of Flex ANI other than to indicate that U S WEST would be unable to fully implement Flex ANI prior to the expiration of the Commission's waiver on March 9, 1998.[3] She agreed to provide as much detail as possible on the status of U S WEST's Flex ANI deployment plans by mid-January.

The purpose of this letter is three-fold: 1) to provide the FCC with formal notification that U S WEST Communications intends to implement Flex ANI to comply with the Commission's requirement to provide payphone-specific digits for per-call compensation purposes; 2) to provide additional detail on U S WEST's Flex ANI implementation plans; and 3) to request an extension of the Commission's existing waiver of the payphone-specific digit requirement.

Summary of Implementation Plan

U S WEST's Flex ANI implementation efforts have been prioritized based on the number of Independent Payphone Service Provider ("IPSP") access lines (i.e., basic or "dumb" PAL lines) served by each U S WEST switch. This approach was used in order to ensure that IPSP lines are converted at the earliest possible date.[4] U S WEST expects that Flex ANI will be installed and available in switches serving approximately 90 percent of all IPSP lines by June 30, 1998.[5] Furthermore,

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[2] Concurrently, in order to streamline the implementation process U S WEST initiated discussions with switch vendors to determine which software upgrades and/or right to use (or "RTU") fees were required to provide Flex ANI capability in its switches.

[3] In an earlier filing U S WEST indicated that it would need additional time beyond March 9, 1998 to deploy alternative technology (e.g., Flex ANI) if OLNS were found to be an unacceptable means of satisfying the requirement to provide payphone-specific coding digits. See Reply of U S WEST, Inc., Petitions to Waive Payphone Coding Digit Requirements, CC Docket No. 96-128, filed November 6, 1997.

[4] The majority of U S WEST-owned payphones (i.e., 75.1 percent or 84,758 payphones as of December 31, 1997) use "smart" PAL lines and already transmit 27 which specifically identifies these lines as serving payphones. U S WEST is sensitive to the fact that the vast majority of IPSP payphones use "dumb" PAL lines which currently do not transmit payphone-specific coding digits.

[5] As of December 31, 1997, U S WEST Communications provided "dumb" PAL service to 86,060 payphones of which 28,092 were U S WEST payphones. U S WEST expects to have Flex ANI activated in switches serving slightly more than 90 percent of all "dumb" PAL lines by the end of June 1998.

U S WEST expects that more than 95 percent of all payphones served by U S WEST switches (i.e., both "smart" and "dumb" PAL lines) will be capable of transmitting payphone-specific digits by June 30, 1998.

IPSP payphone lines are not evenly distributed across U S WEST's territory but are concentrated in certain U S WEST's switches -- with half of U S WEST's switches (i.e., 745 switches) accounting for approximately 90 percent of all IPSP lines. The last 10 percent of IPSP payphone lines are served out of the other half of U S WEST's switches. U S WEST expects to have 99 percent of its "dumb" PAL lines equipped with Flex ANI capability by December 31, 1998.[6] U S WEST will make Flex ANI available to carriers on an office by office basis as soon as all necessary work is completed in a switch.[7]

Implementation Details

Switches

As of the end of 1996, U S WEST had 1483 switches in service including remote switches.[8] The following types and quantities of switches were installed in U S WEST's 14 state service area:

	Number of Switches
Lucent Technologies 5EESS	206
Lucent Technologies 1AESS	109
Northern Telecom DMS 100	140
Northern Telecom DMS10	126
Northern Telecom TOPS	14
Ericsson AXE Host	78
Remotes	810
Total Switches	1483

[6] Flex ANI should be available on all U S WEST "dumb" PAL lines no later than March 30, 1999.

[7] U S WEST's implementation of Flex ANI by itself is insufficient to allow Flex ANI to be used for per-call compensation purposes. Carriers must take steps to receive and use the payphone-specific digits. At a minimum, carriers must request that these digits be transmitted from a given U S WEST end office to the carrier's point of presence ("POP"). Only upon receiving such a request will U S WEST condition the trunks between its end office and the carriers' POP to transmit Flex ANI digits rather than 07. Needless to say, carriers must jointly test these trunks with U S WEST in order to ensure that Flex ANI is working properly. Clearly, not all carriers will choose to accept Flex ANI digits in order to comply with the requirement to pay per-call compensation to payphone service providers.

[8] ARMIS Report 43-07, Table 1.

Only four of these switches currently have the capability to transmit Flex ANI digits. While the Flex ANI feature is "resident" in the vast majority of U S WEST's other switches and may be activated with appropriate vendor authorization (including the payment of right to use fees),[9] it cannot be done immediately at "the flip of a switch". Attachment A contains a schematic showing the steps involved in activating and testing Flex ANI in U S WEST's switches by switch type.

Translations

Once Flex ANI software has been activated in a switch, the next step is to change line class codes ("LCCs") for each "dumb" PAL line served by a given switch. New LCCs (i.e., for "70" and "29") must be assigned to each type of "dumb" PAL line. Then LCCs must be loaded into each switch for all "dumb" PAL lines in order to instruct switches to transmit Flex ANI digits to all carriers electing to receive them.

In order to speed translations work, U S WEST intends to first implement the 70 code for all payphone lines including inmate phones. This will allow U S WEST to minimize the amount of time and manual intervention necessary to create and enter service orders to change LCCs. This approach allows U S WEST to change LCCs on all PAL lines in an end office using a mechanized service order process. Within a short time thereafter, U S WEST will manually convert all PAL lines which IPSPs have identified as inmate lines from 70 to the 29 code (i.e., the Flex ANI code specifically identified with inmate payphones).[10] At the same time, any

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[9] The Flex ANI feature is "resident" in all of the above switch types with the exception of the 1AESS where this software must be purchased separately from Lucent Technologies and loaded into each switch. While Flex ANI software may be resident in a switch, it may not be used to provide the Flex ANI feature without the payment of a RTU fee. Once the RTU fee is paid, the Flex ANI feature is activated through the use of a vendor-supplied password. The actual turn-up of the feature takes approximately 30 minutes in most switches after which testing is performed to ensure that the feature is operating properly. The procedures and time frames for paying RTUs and obtaining passwords vary between switch vendors. For example, the standard interval for receiving passwords from Nortel is three weeks while Lucent provides and activates passwords in real time.

The implementation process is quite a bit different for switches such as 1AESSs where the feature is not "resident" in the switch. In the case of the 1AESS, Flex ANI software must be purchased from Lucent Technologies and loaded into each switch. Once this is done, a Parameter Data Assembly ("PDA") run is required to activate the Flex ANI feature in an individual switch. Under normal conditions, this process takes from 12-14 weeks from feature identification to turn-up. U S WEST has already purchased all necessary software from Lucent Technologies to provide Flex ANI capability in 1AESS switches. Flex ANI software has been loaded and turned-up in 70 of U S WEST's 109 1AESS switches.

[10] U S WEST will notify IPSPs prior to converting "dumb" PAL lines in a switch to Flex ANI in order to allow IPSPs to make any necessary changes to inmate call management systems.

errors resulting from the mechanized service order process will be manually corrected and the appropriate LCCs will be re-input.

Translations work will be performed on a priority basis starting with the end offices with the largest numbers of IPSP PAL lines. Attachment B contains a schematic and an overview of the steps involved in changing line class codes for PAL lines.

Conclusion

The above details clearly demonstrate that U S WEST has made a good faith effort to comply with the Commission's requirement to provide payphone-specific digits and has shown that good cause exists to extend the existing waiver.[11]

Respectfully,

James T. Hannon

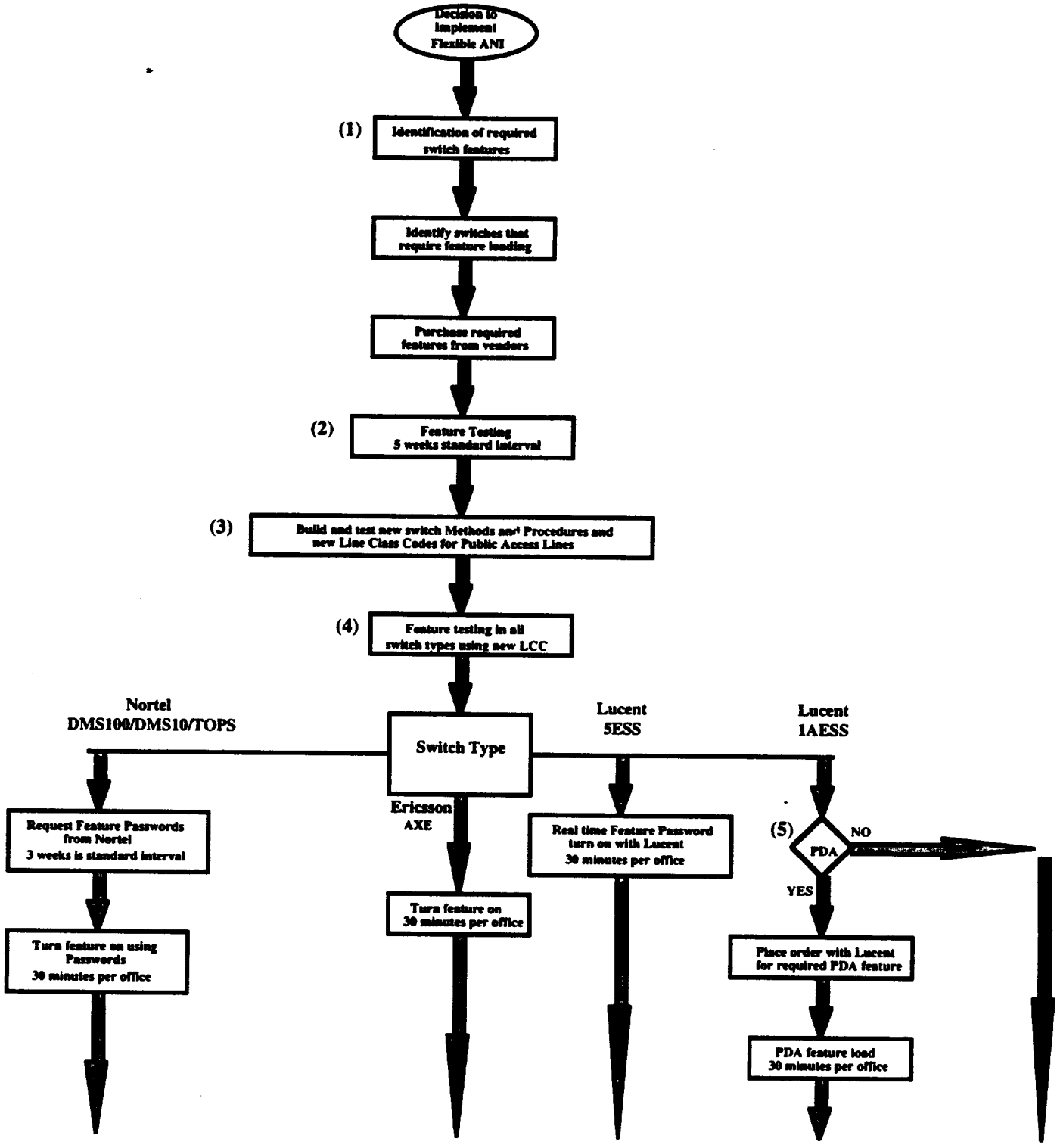
James T. Hannon

cc: Rose Crellin, FCC
Robert Spangler, FCC
Craig Stroup, FCC
Michael Kellogg, Kellogg, Huber, et al.

[11] The special circumstances associated with U S WEST's initial adoption of OLNS for the purpose of providing payphone-specific digits and its subsequent decision to deploy Flex ANI for this purpose (i.e., in order to address Commission concerns) are sufficient to justify an extension of the existing waiver under the prevailing legal standard. See WAIT Radio v. FCC, 418 F.2d 1153 (D.C. Cir. 1969).

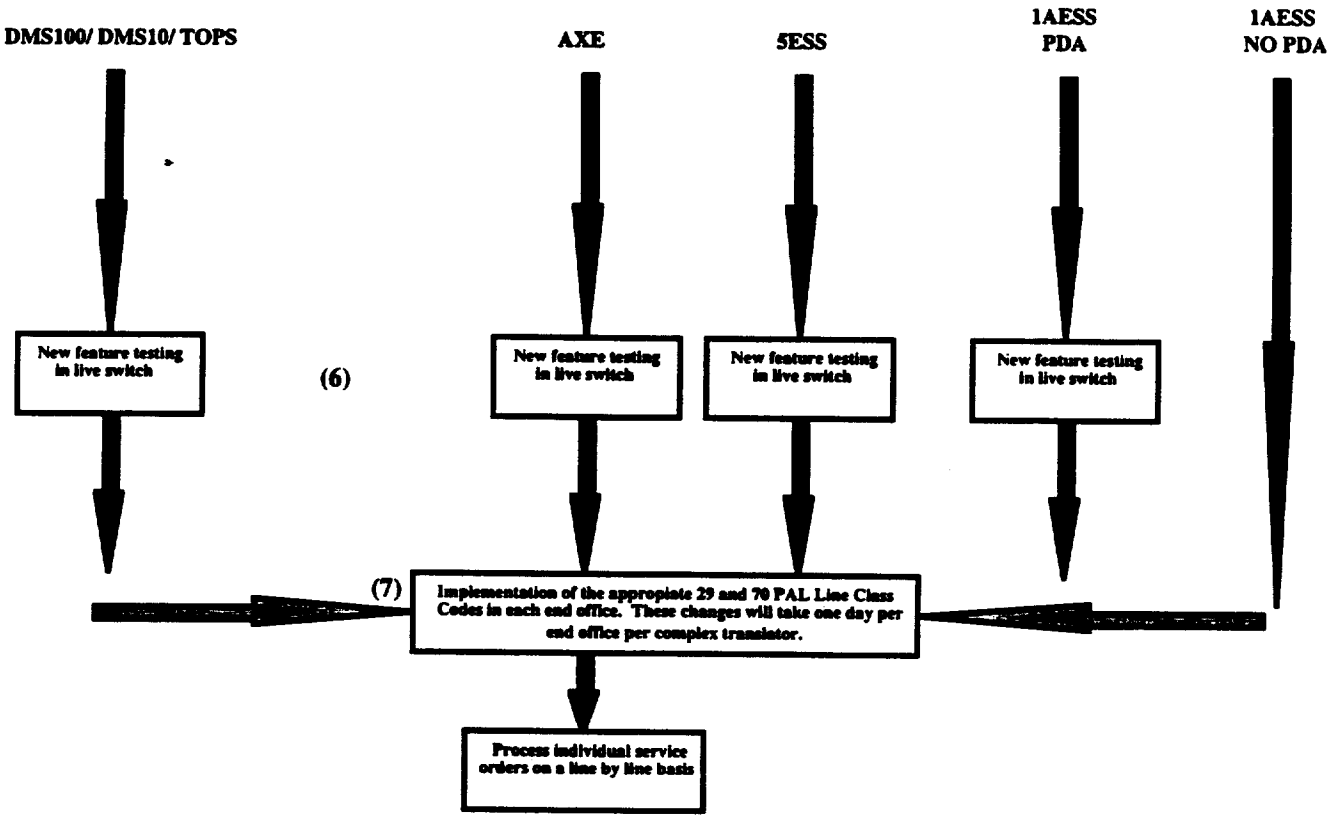
Attachment A

U S WEST Flexible ANI Network Standard Implementation Process



Process Continues On Following Page

Attachment A



Detailed information for referenced steps in above flow chart

(1) - Required Flexible ANI features by switch type:

A. Lucent Technologies 5ESS
   1) Secured Feature 038 (Flexible ANI Information Digit Assignment)
   2) Secured Feature 142 (Flexible ANI Provisioning Enhancements)

B. Lucent Technologies 1AESS
   1) Fast Feature 063 (Flexible Automatic Number Identification))
   2) Fast Feature 067 (Flex ANI Screen)

C. Northern Telecom DMS100
   1) Feature UDD00001 (US Direct Distance Dialing - Flexible Automatic Number Identification)

D. Northern Telecom DMS10
   1) Feature FLEXANI (Flexible Automatic Number Identification Digits)

E. Northern Telecom TOPS
   1) Feature ENSV0006 (Two Digit ANI TOPS Office)

F. Ericsson AXE Host
   1) Feature Flexible ANI

(2) - Feature Testing:

Testing the feature with an Interexchange Carrier (IEC) to test the functionality in the switch. This testing could begin after the product is completely defined and would take about 20 hours per switch type. The estimated time required to accomplish this is 5 weeks from request to completion.

(3) - Building and testing new switch Methods and Procedures as well as new Line Class Codes for PAL:

After feature testing is complete the methods and procedures would be written. The estimated time required to write methods and procedures for each switch type is 20 hours. At the same time the existing Line Class Codes (LCC's) that require an equivalent Flexible ANI LCC built will be identified. It will take about 30 minutes per new LCC to establish the new Flexible ANI LCC in the Standard Translation Application Guide. It is estimated that 176 total new LCC's will be required to accommodate Flexible ANI digits 29 and 70 across the entire U S WEST network.

(4) - Feature testing using new LCC's:

It is necessary to test the switch features and their interactions with the new Flexible ANI LCC's.

(5) - Parameter Data Assembly (PDA):

A PDA run is a process by which the purchaser requests a feature for an individual 1AESS switch. The vendor has to send U S WEST a tape backup copy of the existing information contained on that individual switch along with the new feature. Once the individual switch office receives this tape it has to be uploaded into the switch for the new feature to be activated.

This is a lengthy process that normally takes 12-14 weeks to implement from identification of feature required to feature turn up in the office.

(6) - New feature testing in live switch:

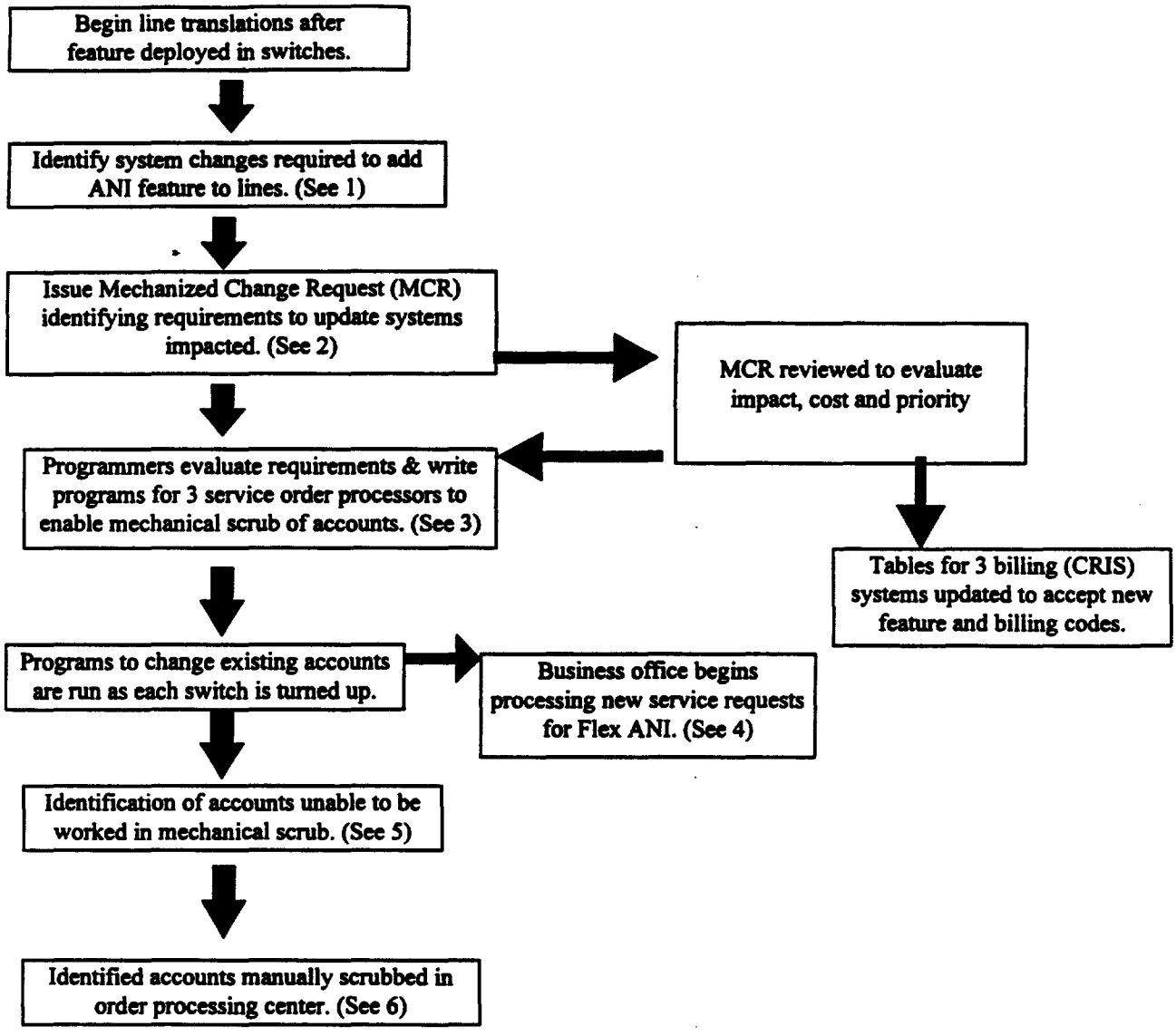
After the feature is turned up in the individual switches a small amount of testing is required in order to ensure that the feature is working properly.

(7) - Implementation of the appropriate 29 and 70 PAL Line Class Codes:

In order to build the new LCC's according to the Methods and Procedures it will take about one hour for each new LCC in every switch. It has been estimated that an average of 8 new LCC's will need to be implemented in each switch.

LINE TRANSLATIONS ORDER FLOW FOR PAYPHONE SERVICE PROVIDERS

ATTACHMENT B

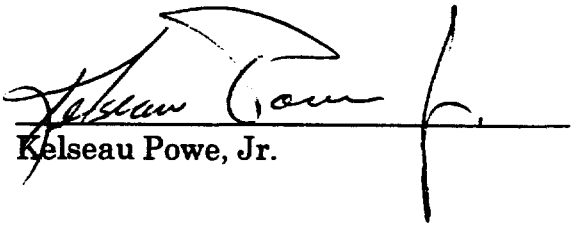


Detailed information for reference steps in above flow chart.

1. The system changes required to add Flex ANI feature to lines are:
   A. Service Order Processors (SOPs): The vehicle that moves an account through U S WEST's systems so changes can be to made to customers' service. There are three SOPs in U S WEST.
   B. CRIS: The billing and record retention system for customer accounts. There are three systems in U S WEST.
2. These requirements are the rules the programmers use to make changes to the software/tables that run each system.
3. In this step, the program tells the service order processors how to identify which accounts need to be changed, and what are the specific changes that need to be made to an account. When these programs are run, thousands of accounts can be mechanically changed (or scrubbed) within hours.
4. After each switch is turned up and the existing accounts are scrubbed, the business office will be able to issue requests for new service that will provide the Flex ANI digits.
5. The accuracy rate for the mechanized scrub is anticipated to be 90%. Those accounts that do not fit within the rules of the program will be separately identified and dropped out for manual handling.
6. After the manual accounts are separately identified, personnel in the order processing centers will enter the orders into the service order processors.

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 11th day of December, 1998, I have caused a copy of the foregoing **EX PARTE LETTER** to be served, via hand delivery, upon the person listed on the attached service list.



Kelseau Powe, Jr.

Lawrence E. Strickling
Federal Communications Commission
Room 500
1919 M Street, N.W.
Washington, DC 20554

CC96-128k.doc
Last Update: 12/9/98

CERTIFICATE OF SERVICE

I, Rebecca Ward, do hereby certify that on this 8th day of January, 1999, I have caused a copy of the foregoing **EX PARTE** to be served, via first class United States mail, postage prepaid, upon the persons listed on the attached service list.

Rebecca Ward

Rebecca Ward

* Served via hand delivery

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